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September 20, 2023

BY: ECF

Hon. Robert W. Lehrburger
United States Magistrate Judge
500 Pearl St
New York, New York 10007

Re: Santos vs. Nembhard
23-cv-2735 (JPO) (RWL)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 9/20/2023

Dear Hon. Lehrburger,

We have recently been retained to represent Plaintiff Indira Santos in this matter. We write pursuant to section I.F. of Your Honor's Individual Practices in Civil Cases to request an adjournment of the initial conference currently scheduled for September 21, 2023. This is Plaintiff's first request and defense counsel consents to this request. Should the court grant this request, the parties are available on the following dates for an initial conference: October 26, October 27 and October 30th.

Furthermore, we respectfully ask that the court disregard the [Proposed] Civil Case Management Plan and Scheduling Order filed by Defendant's counsel on September 14, 2023 Dkt. No. 13 as Plaintiff was not able to participate in its completion since she was pro se at the time of its filing. The parties have conferred and will be submitting a new proposed case management plan to the court in accordance with Your Honor's practice.

We thank Your Honor for your time and consideration in this matter.

Respectfully Submitted,

/s/
Tahanie A. Aboushi, Esq.

The request for an adjournment is granted.

Cc: **BY ECF**
To all counsel

SO ORDERED:

9/20/2023

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE